

Exhibit DD

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
[REDACTED] IN SUPPORT OF
RESPONSE TO FOLLOW-UP
QUESTIONS RE DIXIE AND FLY
FIRES, QUESTIONS 7 THROUGH 36**

Judge: Hon. William Alsup

1 I, [REDACTED] hereby declare under penalty of perjury as follows:

2 1. I make this supplemental declaration based upon personal knowledge and if called
3 as a witness I could and would testify competently to the matters set forth herein.

4 2. I am a Supervisor for Hydro Generation with Pacific Gas and Electric Company
5 ("PG&E"). As a Supervisor for Hydro Generation, I am familiar with messages created and
6 maintained by PG&E's SCADA system regarding operation of the Cresta Dam facility.

7 3. I have reviewed what I am informed are the stored alarm messages in the SCADA
8 system for the Cresta Dam facility for July 13, 2021. A true and correct copy of those alarm
9 messages is attached hereto as Attachment 1. The stored messages include messages all identified
10 as from 6:48:17 a.m. providing notification first of a loss of AC power, then that the onsite
11 standby generator is running, and then that AC power returned to normal. These messages
12 indicate that, as it is designed to do, the standby generator immediately operated to provide AC
13 power when AC power from the distribution line was lost. There is no indication in the SCADA
14 data that AC power from the distribution line was thereafter restored.

15
16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge.

18 Executed this 30th day of August, 2021, in the City of Chico, County of Butte, State of
19 California.

[REDACTED]

Attachment 1

Cresta / Cresta Dam1 / Cresta Dam 2 alarms for 7/13/21

Date / Time (24 hour)	ORIGIN	DESCRIPTION	EVENT	VALUE	KEY	SEV
7/13/2021 0:03:09	CRESTA	CRESTA #2 TURB GATE FULLY CLOSED	RETURN TO NORMAL	NO	01012176	5
7/13/2021 0:03:10	CRESTA	CRESTA #2 TURB GATE POS (CALC)	RETURN TO NORMAL	BETWEEN	02012003	5
7/13/2021 0:05:00	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
7/13/2021 1:43:53	CRESTA	CRESTA #2 TURB GATE FULLY CLOSED	DEVICE CHANGE OF STATE	YES	01012176	5
7/13/2021 1:44:00	CRESTA	CRESTA #2 TURB GATE POS (CALC)	DEVICE CHANGE OF STATE	CLOSED	02012003	5
7/13/2021 2:49:53	CRESTA	CRESTA #2 TURB GATE FULLY CLOSED	RETURN TO NORMAL	NO	01012176	5
7/13/2021 2:50:00	CRESTA	CRESTA #2 TURB GATE POS (CALC)	RETURN TO NORMAL	BETWEEN	02012003	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 RADIAL GATE HOIST LOC/REM	DEVICE CHANGE OF STATE	LOCAL	01010005	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 DISCH VLV 1 POS FAIL	RETURN TO NORMAL	NORMAL	01010103	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 AC POWER FAIL	DEVICE CHANGE OF STATE	ALARM	01010002	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 RG SETPOINT NOT POSSIBLE	DEVICE CHANGE OF STATE	ALARM	01010047	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 DC POWER FAIL	DEVICE CHANGE OF STATE	ALARM	01010003	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 STANDBY GENERATOR RUNNING	DEVICE CHANGE OF STATE	RUNNING	01010014	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 DC POWER FAIL	RETURN TO NORMAL	NORMAL	01010003	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 DISCH VLV 1 POS FAIL	DEVICE CHANGE OF STATE	ALARM	01010103	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 AC POWER FAIL	RETURN TO NORMAL	NORMAL	01010002	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 RG SETPOINT NOT POSSIBLE	RETURN TO NORMAL	NORMAL	01010047	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 RADIAL GATE HOIST LOC/REM	RETURN TO NORMAL	REMOTE	01010005	5
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 FV & RG FLOW TOTAL CFS	LOW LIMIT 1 EXCEEDED	125	03010023	6
7/13/2021 6:48:00	CRESTA DAM 1	CRD1 FISH WATER FLOW CFS	LOW LIMIT 1 EXCEEDED	56.04	03010010	5
7/13/2021 6:48:00	CRESTA DAM 2	CRD2 DC POWER FAIL	DEVICE CHANGE OF STATE	ALARM	01013003	6
7/13/2021 6:48:00	CRESTA DAM 2	CRD2 DISCH VLV 2 POS FAIL	DEVICE CHANGE OF STATE	ALARM	01013103	5
7/13/2021 6:48:00	CRESTA DAM 2	CRD2 DC POWER FAIL	RETURN TO NORMAL	NORMAL	01013003	6
7/13/2021 6:48:00	CRESTA DAM 2	CRD2 DISCH VLV 2 POS FAIL	RETURN TO NORMAL	NORMAL	01013103	5
7/13/2021 6:49:00	CRESTA DAM 1	CRD1 FV & RG FLOW TOTAL CFS	RETURN TO NORMAL	226	03010023	6
7/13/2021 6:49:00	CRESTA DAM 1	CRD1 FISH WATER FLOW CFS	RETURN TO NORMAL	145.43	03010010	5
7/13/2021 6:51:48	CRESTA	CRESTA POWERHOUSE DOOR STATUS	DEVICE CHANGE OF STATE	OPEN	01012135	5
7/13/2021 8:47:00	CRESTA DAM 1	CRD1 DOOR POSITION	DEVICE CHANGE OF STATE	OPEN	01010001	5
7/13/2021 8:49:00	CRESTA DAM 1	CRD1 DOOR POSITION	RETURN TO NORMAL	CLOSED	01010001	5
7/13/2021 15:46:38	CRESTA	CRESTA POWERHOUSE DOOR STATUS	RETURN TO NORMAL	CLOSED	01012135	5
7/13/2021 16:53:04	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:13:22	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:13:28	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:14:02	CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	RAISE	18012005	5
7/13/2021 17:19:36	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:19:36	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:19:43	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:19:43	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:20:16	CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	RAISE	18012005	5
7/13/2021 17:20:16	CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012010	3
7/13/2021 17:20:23	CRESTA	CR-2-A-PH-KV KVOLTS	CONTROL FAILED	RAISE	18012007	5
7/13/2021 17:20:24	CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012004	3
7/13/2021 17:22:27	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:22:28	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:22:34	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:22:34	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:24:09	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:24:10	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:24:15	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:24:18	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:24:49	CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	RAISE	18012005	5
7/13/2021 17:24:58	CRESTA	CR-2-A-PH-KV KVOLTS	CONTROL FAILED	RAISE	18012007	5
7/13/2021 17:25:56	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:26:02	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 17:26:09	CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	Limit Override	OVERVERRIDE	03012004	4
7/13/2021 17:26:10	CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	RETURN TO NORMAL	11.36	03012004	3
7/13/2021 17:26:17	CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	Limit Override	OVERVERRIDE	03012010	4
7/13/2021 17:26:18	CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.37	03012010	3
7/13/2021 17:36:35	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:36:36	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	RAISE	18012005	4
7/13/2021 17:36:42	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
7/13/2021 20:01:08	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:01:08	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:01:09	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:01:48	CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012005	5
7/13/2021 20:03:18	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
7/13/2021 20:03:19	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
7/13/2021 20:03:23	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:03:24	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:03:58	CRESTA	CR-2-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012007	5
7/13/2021 20:04:03	CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012005	5
7/13/2021 20:04:44	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:04:44	CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
7/13/2021 20:04:49	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
7/13/2021 20:04:49	CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
7/13/2021 20:05:24	CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	LOW LOW LIMIT 2 EXCEEDED	11.2	03012004	2

Date / Time

(24 hour)

ORIGIN	DESCRIPTION	EVENT	VALUE	KEY	SEV
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	LOW LOW LIMIT 2 EXCEEDED	11.18	03012010	2
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	Limit Override	OVERRIDE	03012010	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012010	3
CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	, Limit Override	OVERRIDE	03012004	4
CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	RETURN TO NORMAL	11.15	03012004	3
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.17	03012010	3
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012010	3
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.14	03012010	3
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	RAISE	18012007	4
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012010	3
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.17	03012010	3
CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
CRESTA	CR-1-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012005	5
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012010	3
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CR-2-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012007	5
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.17	03012010	3
CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.18	03012004	3
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	HIGH LIMIT 1 EXCEEDED	11.2	03012010	3
CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
CRESTA	CRESTA #1 GEN A-PHASE KILOVOLTS KVOLTS	RETURN TO NORMAL	11.17	03012004	3
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4
CRESTA	CR-2-A-PH-KV KVOLTS	CONTROL FAILED	LOWER	18012007	5
CRESTA	CRESTA #2 GEN A-PHASE KVOLTS KVOLTS	RETURN TO NORMAL	11.17	03012010	3
CRESTA	CR-1-A-PH-KV KVOLTS	Operator Control	LOWER	18012005	4
CRESTA	CR-2-A-PH-KV KVOLTS	Operator Control	LOWER	18012007	4